

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BRANDI NEUBERG,)	
)	
Plaintiff,)	
)	No. 3:12-cv-50119
v.)	
)	VERIFIED COMPLAINT
CENTRAL CREDIT SERVICES, INC.)	(Unlawful Debt Collection Practices)
)	
Defendant.)	

PLAINTIFF'S VERIFIED COMPLAINT

BRANDI NEUBERG (Plaintiff), through attorneys, KROHN & MOSS, LTD., alleges the following against CENTRAL CREDIT SERVICES, INC. (Defendant):

INTRODUCTION

1. Count I of Plaintiff's Complaint is based on the Fair Debt Collection Practices Act, 15 U.S.C. 1692 et seq. (FDCPA).

JURISDICTION AND VENUE

2. Jurisdiction of this Court arises pursuant to 15 U.S.C. 1692k(d), which states that such actions may be brought and heard before "any appropriate United States district court without regard to the amount in controversy."

3. Defendant conducts business in the state of Illinois; therefore, personal jurisdiction is established.

4. Venue is proper pursuant to 28 U.S.C. 1391(b)(2).

PARTIES

5. Plaintiff is a natural person residing in Chicago, Cook County, Illinois.

6. Plaintiff is a consumer as that term is defined by 15 U.S.C. 1692a(3), and according to Defendant, Plaintiff allegedly owes a debt as that term is defined by 15 U.S.C. 1692a(5).

7. Defendant is a debt collector as that term is defined by 15 U.S.C. 1692a(6), and sought to collect a consumer debt from Plaintiff.

8. Plaintiff is informed and believes, and thereon alleges, that Defendant is a collections business with an office in Jacksonville, Florida.

9. Defendant acted through its agents, employees, officers, members, directors, heirs, successors, assigns, principals, trustees, sureties, subrogees, representatives, and insurers.

FACTUAL ALLEGATIONS

10. In or around February of 2012, Defendant began placing collection calls to Plaintiff seeking and demanding payment on an alleged debt.

11. Defendant calls Plaintiff from 888-904-1800, 904- 371-5352, 904-562-6655, 800-419-0746 and possibly other numbers also.

12. Defendant calls Plaintiff seeking to collect a debt from, Tenell Carr and/or Jc Carr (“Carr”).

13. Since the earliest calls, Plaintiff has informed Defendant that Carr does not live at this number, and that further calls cease.

14. Defendant continues to place collection calls to Plaintiff.

COUNT I: DEFENDANT VIOLATED THE FAIR DEBT COLLECTION PRACTICES ACT

15. Defendant violated the FDCPA based on, but not limited to, the following:

- a. Defendant violated §1692d of the FDCPA by engaging in conduct the natural consequence of which is to harass, oppress, or abuse any person in connection with the collection of a debt;
- b. Defendant violated §1692d(5) of the FDCPA by causing a telephone to ring or engaging any person in telephone conversation repeatedly or continuously with intent to annoy, abuse, or harass any person called at

that number;

WHEREFORE, Plaintiff, BRANDI NEUBERG, respectfully requests judgment be entered against Defendant, CENTRAL CREDIT SERVICES, INC, for the following:

16. Statutory damages of \$1000.00 pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. 1692k;

17. Costs and reasonable attorneys' fees pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. 1692k; and

18. Any other relief that this Court deems appropriate.

RESPECTFULLY SUBMITTED,

By: /s/ Adam T. Hill
Adam T. Hill
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Attorneys for Plaintiff

VERIFICATION OF COMPLAINT AND CERTIFICATION

STATE OF ILLINOIS)
)
COUNTY OF _____)

Plaintiff, BRANDI NEUBERG, states the following:

1. I am the Plaintiff in this civil proceeding.
2. I have read the above-entitled civil Complaint prepared by my attorneys and I believe that all of the facts contained in it are true, to the best of my knowledge, information and belief formed after reasonable inquiry.
3. I believe that this civil Complaint is well grounded in fact and warranted by existing law or by a good faith argument for the extension, modification or reversal of existing law.
4. I believe that this civil Complaint is not interposed for any improper purpose, such as to harass any Defendant(s), cause unnecessary delay to any Defendant(s), or create a needless increase in the cost of litigation to any Defendant(s), named in the Complaint.
5. I have filed this Complaint in good faith and solely for the purposes set forth in it.
6. Each and every exhibit I have provided to my attorneys which has been attached to this Complaint is a true and correct copy of the original.
7. Except for clearly indicated redactions made by my attorneys where appropriate, I have not altered, changed, modified or fabricated these exhibits, except that some of the attached exhibits may contain some of my own handwritten notations.

Pursuant to 28 U.S.C. § 1746(2), I, BRANDI NEUBERG, hereby declare (or certify, verify or state) under penalty of perjury that the foregoing is true and correct.

3/19/12

Date



BRANDI NEUBERG